

IN THE DISTRICT COURT IN AND FOR OTTAWA COUNTY  
STATE OF OKLAHOMA

ALEC HAYWARD-PREAUS, an  
Individual,

Plaintiff,

v.

SMART FUTURE XPRESS, INC. a  
Foreign for-Profit Corporation; and  
AMANDEEP SINGH, an Individual,

Defendants.

Case No. CJ-2023-38

ATTORNEY LIEN CLAIMED

FILED  
DISTRICT COURT  
OTTAWA CO. OKLA.

SEP 01 2023

CASSIE REY COURT CLERK

BY C. Blalock

**MOTION TO EXTEND SERVICE DEADLINE**

COMES NOW the Plaintiff, Alec Hayward-Preaus, by and through his attorneys of record, SMOLEN | LAW, PLLC and asks the Court to extend the deadline for him to obtain service upon Defendants. In support, Plaintiff states the following:

1. On March 16, 2023, Plaintiff filed his original Petition with this Court in CJ-2023-38, alleging claims of negligence against the Defendants arising out of a motor vehicle collision which occurred April 5<sup>th</sup>, 2021.

2. Pursuant to Okla. Stat. tit. 12 § 2004(I), the deadline for Plaintiff to serve Defendants with the Petition in this case is September 12, 2023.

3. Plaintiff is attempting to identify an additional defendant for purposes of filing an amended complaint. Plaintiff believes he will be able to locate this additional defendant within that time period.

4. Accordingly, Plaintiff requests an additional ninety (90) days, until December 11, 2023 to locate the additional party.

5. For the Court's convenience, a proposed order is being submitted herewith.

WHEREFORE, premises considered, Plaintiff prays the Court grant him an additional ninety (90) days, until December 11, 2023 to perfect service on Defendants.

Respectfully submitted,

SMOLEN | LAW, PLLC



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